

Case 1:17-cv-05725-RJD-RER Document 5-1 Filed 10/04/17 Page 1 of 3 PageID #: 353

5. If approved by the Court, the deadlines set forth in the Order to Show Cause, Temporary Restraining Order, and Order Freezing Assets and Granting Other Relief (the “OSC”) (DE #3) shall be amended to provide:

- a. The sworn verified accounting ordered by Paragraph XII of the OSC shall be due by October 30, 2017;
- b. The opposing papers in response to the OSC ordered by Paragraph XV of the OSC shall be due by November 17, 2017;
- c. The Commission’s reply papers ordered by Paragraph XV of the OSC shall be due by November 20, 2017; and
- d. The hearing on the order to show cause ordered by Paragraph I of the OSC shall be adjourned to 10:00 a.m. on November 21, 2017, or until such other date as the Court may provide.

6. If approved by the Court, the following orders, currently set to expire on Friday, October 13, 2017, shall be extended up and until the conclusion of the hearing on the order to show cause as set forth in paragraph 5(d) herein, or until such date as the Court has held the preliminary injunction hearing contemplated by the OSC, or until such time as the Court modifies any portion of the order based on a joint stipulation by the parties:

- a. The temporary restraining orders imposed by paragraphs V, VI, and VII of the OSC;
- b. The asset freeze imposed by paragraph VIII of the OSC, provided that the parties may at a subsequent time stipulate for the removal of certain accounts from the purview of the asset freeze;
- c. The repatriation order imposed by paragraph IX of the OSC; and

d. The order against destruction of documents imposed by paragraph X of the OSC.

7. Nothing in this stipulation shall be construed as affecting the parties' rights and responsibilities under all other parts of the OSC, including but not limited to Defendant Zaslavskiy's obligation to surrender his passport and not leave the United States under the conditions set forth in paragraph XIII of the OSC, the Commission's right to pursue expedited discovery as per the terms of paragraph XI of the OSC, and the Commission's right to serve discovery requests and other filings as per the terms of that paragraph and of paragraph XV of the OSC.

Dated: New York, New York  
October 4, 2017

SECURITIES AND EXCHANGE COMMISSION

By: 

Jorge G. Tenreiro

200 Vesey Street, Suite 400  
New York, NY 10281  
(212) 336-9145 (Tenreiro)

Attorneys for Plaintiff

POLSINELLI PC

By: 

Richard B. Levin

William B. Mateja

Jason A. Nagi

1401 Eye Street, N.W., Suite 800  
Washington, DC 20005

Attorneys for Defendants REcoin Group  
Foundation, LLC, DRC World, Inc., and Maksim  
Zaslavskiy

SO ORDERED:

UNITED STATES DISTRICT JUDGE